




American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

October 3, 2003

To: Local and State Presidents
National Business Agents
Regional Coordinators
Resident Officers

Fr: Greg Bell, Director 
Industrial Relations

Re: Use of Gloves on Automated Equipment

For some time, the APWU has been pursuing a resolution of the issue of wearing gloves on automated equipment. However, we were unable to reach a resolution over this issue with the Postal Service.

At the request of APWU headquarters, OSHA initiated an investigation of the Postal Service's policy of not allowing gloves to be worn around automated equipment. The Postal Service had said that the wearing of gloves around automated equipment presented a serious hazard of hands being caught in the moving parts of the equipment. APWU asserted to OSHA that gloves were necessary to protect member's hands from hazards such as cuts and scrapes and, more importantly, biological and hazardous material present in the mail. APWU further asserted to OSHA that if automated equipment presented a hazard where hands could come into contact with moving parts of the equipment then there was a serious OSHA violation present related to machine guarding.

As a result of APWU's request, OSHA contacted the Postal Service and conducted an investigational review of postal equipment. Although the union requested to be a part of this review, we were denied the opportunity. Nevertheless, the OSHA team concluded that there was no evidence to determine that the use of Nitrile gloves around USPS mail processing equipment contributes to an increase in the number of potential hand injuries. According to the report, "[t]he USPS did not have any accident investigation data pertaining to hand injuries (resulting from gloves being caught in the moving machinery parts) for review by the OSHA team members. Further, there were no USPS near-miss data pertaining to the potential hand injuries."

As a result of OSHA's investigation, the Postal Services issued a memo on September 26, 2003 regarding Nitrile Gloves Usage. The memo states that postal employees are allowed to wear Nitrile gloves while operating nationally deployed automated equipment.

Attached please find copies of the OSHA report and the Postal Service's memo. If you have any questions, please contact Corey Thompson, APWU Safety and Health Specialist, at 202-842-4273.

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



Reply to the Attention of:

DEP/GIE/SMK

SEP 25 2003

Mr. Corey Thompson
APWU
Industrial Relations
1300 L Street, NW
Washington, D.C. 20005

Dear Mr. Thompson:

The purpose of this letter is to inform you of the Occupational Safety and Health Administration's (OSHA's) decision pertaining to a technical assistance visit to the United States Postal Service (USPS) facility, located in Merrifield, VA. The scope of the visit was limited to assessing the hazards associated with the use of Nitrile gloves around mail processing equipment. The visit was conducted by two safety and health professionals of my staff, who visited the USPS facility on July 8, and July 14, 2003.

The team concluded that the use of Nitrile gloves by employees around mail processing equipment should not create an additional hazard, provided they use safe procedures in removing letters that could jam during mail processing. Enclosed, please find the team's summary and recommendations outlined in a memorandum from Mr. R. Davis Layne, OSHA's Deputy Assistant Secretary, to Mr. Frank Strasheim, OSHA's Regional Administrator in Region IX.

Thank you for your interest in the occupational safety and health. If you have any questions, please do not hesitate to contact the Office of General Industry Enforcement at 202-693-1850.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Malassi".

Richard E. Fairfax, Director
Directorate of Enforcement Programs

for


Enclosure



Reply to the Attention of:

SEP 12 2003

MEMORANDUM FOR: FRANK STRASHEIM
REGIONAL ADMINISTRATOR

FROM: 
R. DAVIS LAYNE
DEPUTY ASSISTANT SECRETARY

SUBJECT: Report on Technical Assistance Visit to the United States Postal Service (USPS) Regarding Mail Processing Equipment and Use of Nitrile Gloves

This memorandum is to inform you of the conclusion of a technical assistance visit to the USPS facility located in Merrifield, VA. The purpose of the visit was to gain an understanding of the safety guarding of the mail processing equipment and assess the concern raised that employee use of Nitrile gloves around mail processing equipment increases the hazard related to the operation of the equipment. Below is the report summary from the Directorate of Enforcement Programs team that visited the Merrifield USPS facility.

Summary

A senior safety engineer from the Occupational Safety and Health Administration's (OSHA) National Office visited the USPS facility located in Merrifield, VA, on July 8, 2003. The visit was conducted as a result of the USPS Occupational Safety Group's request to determine whether the hazards associated (specifically the hazards of hand(s) being caught in the ingoing nip points) with the use of Nitrile gloves around mail processing equipment are greater, when compared to the hazards without their use.

Another visit accompanied by a different safety professional was conducted on July 14, 2003, to observe the actual mail processing activities and to collect additional information. During this visit, when evaluating exposure to hazards associated with the mail processing equipment, the OSHA team members took several factors into consideration, such as points-of-operation, ingoing nip points, rotating parts and the proximity of employee exposures to any potential hazards (such as hazards from ingoing nip points that can not be guarded). The team also looked at the mail processing equipment functions such as the ability to accidentally switch on, and the possibility of employees removing letters or packages in the event of paper jams. The OSHA team noted during onsite visits that the mail processing machines at the Merrifield facility were properly guarded to meet OSHA's Subpart O (29 CFR 1910) requirements. The team also noted that where guarding was not possible at the points-of-operation (where the mail is being

processed), the openings sometimes were greater than 1/4" in size. These were large enough to potentially cause injuries to hands or fingers in the event an employee placed his/her hand in the danger zone in order to remove jammed letters without first stopping or shutting down the affected portion of the equipment. However, upon discussing this issue with the accompanying USPS Safety Group members, the OSHA team understood that the USPS procedures prohibit the employees from placing their hands near the ingoing nip points to remove any paper jams unless the affected portions of the machines are stopped.

The OSHA team did not find evidence to determine that the use of Nitrile gloves around USPS mail processing equipment contributes to an increase in the number of potential hand injuries. The USPS did not have any accident investigation data pertaining to hand injuries (resulting from the gloves being caught in the moving machinery parts) for review by the OSHA team members. Further, there were no USPS near-miss data pertaining to the potential hand injuries. As a result, the OSHA team could not conclusively determine, from lack of such data, whether the use of gloves (particularly the Nitrile gloves) while working near mail processing equipment contributed to an increase in the hand injury incidence rate. Additionally, the OSHA team reviewed the Bureau of Labor Statistics (BLS) published report entitled, "Work-related Hand Injuries and Upper Extremity Amputations," Bulletin 2160, December 1982. The team did not find any data in the report, specific to injuries resulting directly from the use of Nitrile gloves around moving machinery parts.

Recommendations:

Based on the information gathered with respect to the use of Nitrile gloves around mail processing equipment, the OSHA team believes that such use should not contribute to an increase in the potential hand-injury hazard, provided employees follow safe procedures in removing any jammed letters from the machines. The team's decision was based on the following factors:

- a) the unused portions of the mail processing machines at the Merrifield facility were found to be guarded to meet OSHA's Subpart O (29 CFR 1910) machine guarding requirements;
- b) the employees were found to maintain safe distances from the unguarded mail processing ingoing nip points during the mail processing;
- c) the Nitrile gloves tend to fit the hands closely when worn; and
- d) the USPS has procedures to safely remove any jammed papers from the operating mail processing equipment, only after the affected portions of the machines are stopped.

Should you have any questions, please contact Tom Galassi at 202-693-2127.

September 26, 2003

SUBJECT: Nitrile Gloves Usage

The Postal Service requested OSHA technical assistance to determine if employee use of Nitrile gloves on nationally deployed mail processing equipment increases the hazards related to the operation of equipment. Specifically, the hazards associated with hand(s) being caught in the ingoing equipment nip points with the gloves compared to the hazards without their use was evaluated. The equipment design, operation, procedures, and related literature were considered by OSHA.

OSHA determined the use of Nitrile gloves does not contribute to an increase in the number of potential hand injuries. The decision was based on the following factors:

- a) the unused portions of the mail processing equipment were found to be guarded to meet OSHA's Subpart O (29CFR 1910) machine guarding requirement;
- b) the employees were found to maintain safe distances from the unguarded mail processing ingoing nip points during the mail processing;
- c) the Nitrile gloves tend to fit the hands closely;
- d) the USPS has procedures to safely remove any jammed papers from the operating mail processing equipment.

We have determined with OSHA's input the voluntary use of Nitrile gloves is allowed only around nationally deployed Postal Service mail processing equipment. Employees must ensure they keep hands clear of ingoing nip points.

This change has the approval of Suzanne F. Medvidovich, Senior Vice President, Human Resources, and John A Rapp, Senior Vice President, Operations.